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8 BRENDA ALCANTARA

9  
10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

12  
13 URSULA BYRAM, S.B. by and  
14 through guardian ad litem TIMOTHY  
15 BYRAM, N.B. by and through guardian  
16 ad litem TIMOTHY BYRAM, and A.B.  
17 by and through guardian ad litem  
18 KAITLYN HUMENCHUK,  
19 individually and as successors-in-  
20 interest to Everett Byram,

21 Plaintiffs,

22 v.

23 COUNTY OF LOS ANGELES,  
24 BLAKE RUNGE, and BRENDA  
25 ALCANTARA,

26 Defendants.

Case No. 2:23-cv-09285-KS

[Assigned to Hon. Karen L. Stevenson,  
Courtroom 580]

**DECLARATION OF JORDAN S.  
STERN, ESQ IN SUPPORT OF  
JOINT MOTION IN *LIMINE* NO. 2  
TO PRECLUDE ANY REFERENCE  
OR EVIDENCE OF ALLEGED  
"DEPUTY GANGS" AND  
"DEPUTY  
CLIQUES/SUBGROUPS"  
(MOVING PARTY: DEFENDANTS)**

Final Pretrial Conference/Hearing on  
Motions in *Limine*

Date: January 21, 2025

Time: 10:00 a.m.

Courtroom: 580

Trial Date: February 10, 2025

**DECLARATION OF JORDAN S. STERN, ESQ.**

I, Jordan S. Stern, Esq., declare:

1. I am an attorney duly licensed to practice before this Court and am a partner with Hurrell Cantrall LLP, attorneys of record for Defendants COUNTY OF LOS ANGELES, DEPUTY BLAKE RUNGE and DEPUTY BRENDA ALCANTARA ("Defendants"). The facts set forth herein are of my own personal knowledge and if sworn I could and would testify competently thereto.

2. I make this declaration in support of Joint Motion in *Limine* No. 2 to preclude any reference or evidence of alleged "deputy gangs" and "deputy cliques/subgroups" during trial.

3. Pursuant to *Local Rule* 7-3 and this Court's Order (Dkt. 68), the parties thoroughly met and conferred about the subject of the instant motion in *Limine* on November 21, 2024. After such discussion, opposing counsel refused to stipulate to the exclusion of this subject evidence.

4. A true and correct copy of the pertinent portions of the deposition testimony of Defendant Deputy Blake Runge, is attached hereto as **Exhibit A**.

5. A true and correct copy of Plaintiffs' First Amended Complaint, is attached hereto as **Exhibit B**.

6. A true and correct copy of the pertinent portions of Deputy Blake Runge's Response to Plaintiffs' Request for Admissions, set One, is attached hereto as **Exhibit C**.

7. A true and correct copy of the pertinent portions of Deputy Blake Runge's Response to Plaintiffs' Request for Production of Documents, set One, is attached hereto as **Exhibit D**.

8. It is respectfully submitted that evidence concerning "cliques" or "deputy gangs," would be offered by the Plaintiffs in an effort to support their absurd suggestion that Defendant Deputy Runge ("Deputy Runge") is affiliated with a "deputy gang" or "deputy clique" and maliciously singled out and attacked Plaintiffs.

1 By presenting evidence of “cliques” or “deputy gangs” or eliciting testimony  
2 regarding Deputy Runge's assignment to North County Correctional Facility during  
3 2016 to 2019, where the origins of the Inclusive Province A Klansman I Am  
4 ("AKIA") ("IPA") also began, Plaintiffs will undoubtedly mislead the jury and create  
5 a confusion of the issues. The quintessential issue the jury should consider is whether  
6 the use of force by the Deputy Defendants was objectively reasonable in light of the  
7 facts and circumstances confronting them.

8 I declare under penalty of perjury under the laws of the State of California and  
9 the United States of America that the foregoing is true and correct.

10  
11 Executed on December 10, 2024, at Los Angeles, California.

12  
13 /s/ Jordan S. Stern  
14 JORDAN S. STERN, ESQ.  
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**EXHIBIT “A”**

**URSULA BYRAM, S.B., ET AL vs COUNTY OF LOS ANGELES, ET AL**  
**Blake Runge on 05/14/2024**

1 UNITED STATES DISTRICT COURT  
2 CENTRAL DISTRICT OF CALIFORNIA

3

4 URSULA BYRAM, S.B., by and through )  
guardian ad litem TIMOTHY BYRAM, N.B., )  
5 by and through guardian ad litem )  
TIMOTHY BYRAM, and A.B., by and )  
6 through guardian ad litem KAITLYN )  
HUMENCHUK, individually and as )  
7 successor-in-interest to Everett )  
Byram, )  
8 )  
Plaintiffs, )  
9 )  
vs. ) Case No.  
10 ) 2-23-CV-09285-KS  
COUNTY OF LOS ANGELES, BLAKE RUNGE, )  
11 and DOES 1-10, inclusive, )  
12 )  
Defendants. )  
\_\_\_\_\_ )

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16 REMOTE VIDEOCONFERENCE DEPOSITION OF

17 BLAKE RUNGE

18 TUESDAY, MAY 14, 2024

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22

23 Reported Stenographically By:

24 Jinna Grace Kim, CSR No. 14151

25 Job No.: 67867

**URSULA BYRAM, S.B., ET AL vs COUNTY OF LOS ANGELES, ET AL**  
**Blake Runge on 05/14/2024**

Page 2

1 UNITED STATES DISTRICT COURT  
2 CENTRAL DISTRICT OF CALIFORNIA  
3

4 URSULA BYRAM, S.B., by and through )  
guardian ad litem TIMOTHY BYRAM, N.B., )  
5 by and through guardian ad litem )  
TIMOTHY BYRAM, and A.B., by and )  
6 through guardian ad litem KAITLYN )  
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7 successor-in-interest to Everett )  
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Plaintiffs, )  
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vs. ) Case No.  
10 ) 2-23-CV-09285-KS  
COUNTY OF LOS ANGELES, BLAKE RUNGE, )  
11 and DOES 1-10, inclusive, )  
12 )  
Defendants. )  
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The remote videoconference deposition of BLAKE  
RUNGE, taken on behalf of the Plaintiffs, beginning at 10:05  
a.m., and ending at 12:19 p.m., on Tuesday, May 14, 2024,  
before Jinna Grace Kim, Certified Stenographic Shorthand  
Reporter No. 14151.

**URSULA BYRAM, S.B., ET AL vs COUNTY OF LOS ANGELES, ET AL**  
**Blake Runge on 05/14/2024**

Page 3

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**URSULA BYRAM, S.B., ET AL vs COUNTY OF LOS ANGELES, ET AL**  
**Blake Runge on 05/14/2024**

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**URSULA BYRAM, S.B., ET AL vs COUNTY OF LOS ANGELES, ET AL**  
**Blake Runge on 05/14/2024**

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1 A. I believe October of 2016.

2 Q. How old are you now?

3 A. 34-years old.

4 Q. How tall?

5 A. Six-foot-six.

6 Q. How much do you currently weigh?

7 A. Approximately 240 pounds.

8 Q. Was that about your weight at the time of the  
9 shooting incident we're here to talk about?

10 A. I was probably like 15 pounds lighter.

11 Q. So you think you may have gained some weight since  
12 the incident?

13 A. Yes, sir.

14 Q. Did you play any sports in high school or college?

15 A. No.

16 Q. After graduating from the academy where were you  
17 assigned initially?

18 A. NCCF which is the North County Correctional  
19 Facility.

20 Q. And what time frame were you assigned there?

21 A. From 2016 to 2019, May 2019.

22 Q. What was your general assignment when you were  
23 there?

24 A. I worked the Inmate Processing Center.

25 Q. Any other assignments while you were there?

**URSULA BYRAM, S.B., ET AL vs COUNTY OF LOS ANGELES, ET AL**  
**Blake Runge on 05/14/2024**

**Page 10**

1 A. Just general staff stations, monitoring inmates and  
2 dorms.

3 Q. If you were involved in a force incident while you  
4 were working at the North Facility, would you have to  
5 generate some type of a report explaining the force used and  
6 the reasons for the force?

7 A. Yes.

8 Q. And do you have an estimate as to how many force  
9 incidents you were involved in when you were working at the  
10 jails?

11 A. Maybe approximately ten.

12 Q. When you worked the jails, would you carry either OC  
13 spray or a Taser on you?

14 A. Yes. Both.

15 Q. Both?

16 A. Yes.

17 Q. Were some of the force incidents including the use  
18 of a Taser while you were working the jails?

19 A. No.

20 Q. Did any of the force incidents include the use of OC  
21 spray?

22 A. Yes.

23 Q. So after working at the North Facility, I guess that  
24 would take us to May of 2019.

25 A. Yes, sir.

**URSULA BYRAM, S.B., ET AL vs COUNTY OF LOS ANGELES, ET AL**  
**Blake Runge on 05/14/2024**

Page 11

1 Q. And then where were you assigned after that?

2 A. I was assigned to Palmdale Station.

3 Q. Was that a patrol assignment?

4 A. Yes, sir.

5 Q. And did you have a period of field training?

6 A. Yes.

7 Q. And how long was that for, approximately?

8 A. Approximately six months.

9 Q. And when did your field training end,  
10 approximately?

11 A. February of 2020.

12 Q. Did you discuss tactics and use of force during some  
13 of your field training?

14 A. Yes.

15 Q. And did you have to become familiar with some of the  
16 policies related to use-of-force, for example?

17 A. Yes.

18 Q. So after February, 2020 you were able to go out on  
19 patrol by yourself?

20 A. Yes.

21 Q. And the shooting incident we're here to talk about,  
22 do you recall the date?

23 A. February, 2023.

24 Q. So would it be about three years since your field  
25 training ended?

**URSULA BYRAM, S.B., ET AL vs COUNTY OF LOS ANGELES, ET AL**  
**Blake Runge on 05/14/2024**

Page 15

1 before?

2 A. Yes.

3 Q. On how many occasions, approximately?

4 A. Approximately three or so.

5 Q. Now, you're familiar with the bean bag rounds?

6 A. Yes, sir.

7 Q. Had you ever used bean bag rounds in the field

8 before?

9 A. I have not.

10 Q. How about the 40-millimeter rounds, had you ever

11 used those in the field before?

12 A. No.

13 Q. Had you ever been present where either the bean bag

14 rounds or the 40-millimeter rounds were used?

15 A. Yes.

16 Q. And can you explain to me on approximately how many

17 occasions?

18 A. Approximately ten or fifteen.

19 Q. Had you ever been present where either the bean bag

20 rounds or the 40-millimeter rounds were used against someone

21 who had a knife?

22 A. Yes.

23 Q. On approximately how many occasions?

24 A. Approximately five or so, I think.

25 Q. Do you recall on the day of the shooting incident

**URSULA BYRAM, S.B., ET AL vs COUNTY OF LOS ANGELES, ET AL**  
**Blake Runge on 05/14/2024**

Page 16

1     **what your shift hours were, approximately?**

2           A.     I was working 08:00 to midnight.

3                   So 16-hour shift.

4           **Q.     And how many days a week would you work at the**  
5     **time?**

6           A.     Between four and five.

7           **Q.     And would they all be 16-hour shifts?**

8           A.     No.   Eight or sixteen, but majority would be 16-hour  
9     shifts.

10          **Q.     Was that common at the time, if you know, for**  
11     **deputies to have 16-hour shifts?**

12          A.     Yes, sir.   Due to our staffing shortages.

13          **Q.     So you would have started your shift at about 8:00**  
14     **in the morning?**

15          A.     Yes.

16          **Q.     And then do you have an estimate as to what time the**  
17     **shooting incident occurred?**

18          A.     I believe around 22:00.

19          **Q.     So about 10 o'clock at night?**

20          A.     Yes.

21          **Q.     So you would have been working approximately 14**  
22     **hours at the time?**

23          A.     Yes, sir.

24          **Q.     Would you sometimes have coffee just to keep**  
25     **yourself awake and alert?**

URSULA BYRAM, S.B., ET AL vs COUNTY OF LOS ANGELES, ET AL  
Blake Runge on 05/14/2024

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1 Q. And had his gun out?

2 A. Yes.

3 Q. Now, I'm going to ask you some questions, and I'm  
4 not sure where this is going to go, but I'll try to be brief.

5 Bear with me. It's on a topic different from the  
6 shooting.

7 When you worked at NCCF, was there any group that  
8 you were aware of referred to as IPA?

9 A. No.

10 Q. Did you ever hear of a group called Province AKIA?

11 A. No.

12 Q. Let me just say it since you have a chance to clear  
13 the air on this.

14 Have you ever been involved in any deputy gang?

15 A. No.

16 Q. Do you have any tattoo that symbolizes your  
17 association with any deputy group or gang?

18 A. No.

19 Q. Okay. Thank you.

20 That's all the questions I have.

21 MR. GALIPO: Tom, did you have any follow-up today?

22 MR. HURRELL: No, Dale.

23 MR. GALIPO: All right.

24 Well, let's go off the record for a moment.

25 (Discussion held off the record.)



URSULA BYRAM, S.B., ET AL vs COUNTY OF LOS ANGELES, ET AL  
Blake Runge on 05/14/2024

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DECLARATION UNDER PENALTY OF PERJURY

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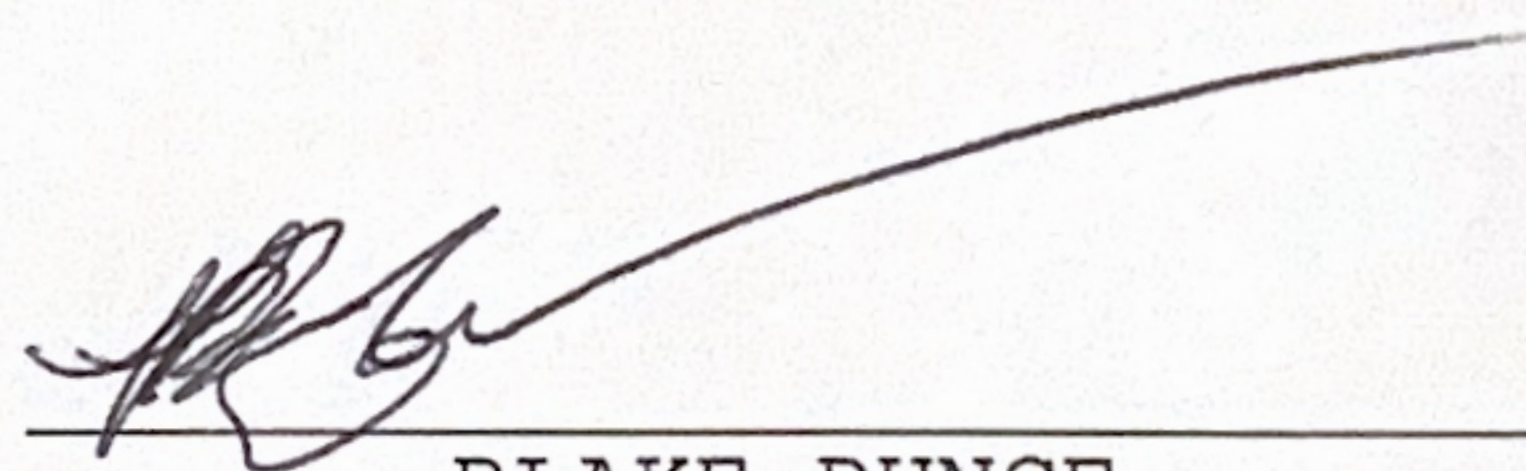
Case Name: Ursula Byram, et al. vs. County of Los Angeles,  
et al.

Date of Deposition: May 14, 2024

Job No.: 67867

I, BLAKE RUNGE, hereby certify  
under penalty of perjury under the laws of the State of  
California that the foregoing is true and correct.

Executed this 2 day of JULY,  
2024, at LOS ANGELES, California.

  
\_\_\_\_\_  
BLAKE RUNGE



**URSULA BYRAM, S.B., ET AL vs COUNTY OF LOS ANGELES, ET AL**  
**Blake Runge on 05/14/2024**

**Page 69**

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CERTIFICATE

OF

CERTIFIED STENOGRAPHIC SHORTHAND REPORTER

I, JINNA GRACE KIM, CSR No. 14151, a Certified  
Stenographic Shorthand Reporter of the State of California,  
do hereby certify:

That the foregoing proceedings were taken before me  
at the time and place herein set forth;

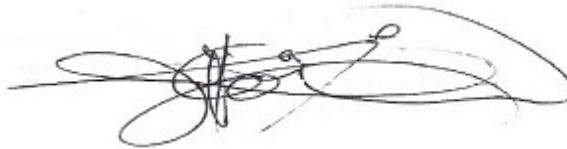
That any witnesses in the foregoing proceedings,  
prior to testifying, were placed under oath;

That a verbatim record of the proceedings was made  
by me, using machine shorthand, which was thereafter  
transcribed under my direction;

Further, that the foregoing is an accurate  
transcription thereof.

I further certify that I am neither financially  
interested in the action, nor a relative or employee of any  
attorney of any of the parties.

IN WITNESS WHEREOF, I have subscribed my name, this  
date: May 14, 2024.



Jinna Grace Kim, CSR No. 14151



## **EXHIBIT “B”**

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*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

URSULA BYRAM, S.B. by and  
through guardian *ad litem* TIMOTHY  
BYRAM, N.B. by and through  
guardian *ad litem* TIMOTHY  
BYRAM, and A.B. by and through  
guardian *ad litem* KAITLYN  
HUMENCHUK, individually and as  
successors-in-interest to Everett  
Byram,

Plaintiffs,

v.

COUNTY OF LOS ANGELES,  
BLAKE RUNGE, and BRENDA  
ALCANTARA,

Defendants.

Case No.: 2:23-cv-09285-SB-MAR

**AMENDED COMPLAINT**

Federal Law Claims

1. Fourth Amendment, Excessive Force (42 U.S.C. § 1983)
2. 42 U.S.C. § 1983 Fourteenth Amendment, Interference with Familial Relationship
3. Fourth Amendment, Unlawful Detention (42 U.S.C. § 1983)
4. Municipal Liability, Unconstitutional Custom or Policy (42 U.S.C. § 1983)
5. Municipal Liability, Failure to Train (42 U.S.C. § 1983)
6. Municipal Liability, Ratification (42 U.S.C. § 1983)
7. Americans with Disabilities Act (42 U.S.C. § 12132)

State Law Claims

8. Battery
9. Negligence
10. False Imprisonment
11. Violation of Cal. Civil Code § 52.

1           33. DEPUTY RUNGE failed to provide a verbal warning indicating  
2 that deadly force would be used and did not afford Mr. Byram an opportunity  
3 to heed any such warning.

4           34. As a direct and proximate result of the shooting, Mr. Byram  
5 experienced severe pain and suffering, loss of life, and loss of earning  
6 capacity.

7           35. Upon information and belief, the Inclusive Province AKIA  
8 (“IPA”) is a violent deputy gang involved in criminal activity, similar to other  
9 deputy gangs within the Los Angeles County Sheriff’s Department, such as  
10 the “Executioners” operating in Compton, or the “Bandidos” operating out of  
11 East Los Angeles. AKIA is Ku Klux Klan shorthand for “A Klansman I Am.”

12           36. Upon information and belief, deputy members of IPA use  
13 violence and unreasonable force against those they are sworn to protect, as  
14 well as falsify reports, violating the civil rights of hundreds of citizens of Los  
15 Angeles.

16           37. Upon information and belief, at the time of the incident,  
17 DEFENDANT RUNGE was a member of the IPA.

18           38. Following the shooting of Mr. Byram, DEPUTY ALCANTARA  
19 detained URSULA BYRAM in a patrol vehicle without justification.

20           39. URSULA BYRAM was held in this manner for an extended  
21 period exceeding 4 hours.

22           40. During her unlawful detention, URSULA BYRAM was placed in  
23 a patrol vehicle along with her son, but her daughter was absent.

24           41. The involved deputies deliberately withheld information from  
25 URSULA BYRAM concerning the condition and whereabouts of her  
26 husband, Mr. Byram, and her daughter.

1 WHEREFORE, Plaintiffs URSULA BYRAM, S.B., N.B., and A.B. request  
2 entry of judgment in their favor against Defendants COUNTY OF LOS  
3 ANGELES, BLAKE RUNGE, and BRENDA ALCANTARA; as follows:

- 4 1. For compensatory damages according to proof at trial, including:  
5 survival damages, not limited to pre-death pain and suffering and loss of life under  
6 federal and state law; and wrongful death damages under federal and state law;  
7 2. For funeral and burial expenses, and loss of financial support;  
8 3. For loss of consortium;  
9 4. For punitive and exemplary damages against BLAKE RUNGE in an  
10 amount to be proven at trial;  
11 5. For statutory damages;  
12 6. For reasonable attorneys' fees including litigation expenses;  
13 7. For costs of suit and interest incurred; and  
14 8. For such other and further relief as the Court may deem just, proper,  
15 and appropriate.

16  
17 DATED: March 29, 2024

**LAW OFFICES OF DALE K. GALIPO**

18 /s/ Dale K. Galipo

19 Dale K. Galipo

20 Cooper Alison-Mayne

21 *Attorneys for Plaintiffs*  
22  
23  
24  
25  
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27  
28

**DEMAND FOR JURY TRIAL**

Plaintiffs hereby submit this demand that this action be tried in front of a jury.

DATED: March 29, 2024

**LAW OFFICES OF DALE K. GALIPO**

/s/ Dale K. Galipo

Dale K. Galipo

Cooper Alison-Mayne

*Attorneys for Plaintiffs*

## **EXHIBIT “C”**

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7 Attorneys for Defendants, COUNTY OF LOS ANGELES and BLAKE RUNGE

8  
9  
10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

12  
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15 by and through guardian ad litem  
KAITLYN HUMENCHUK,  
16 individually and as successors-in-  
interest to Everett Byram,

17 Plaintiffs,

18 v.

19 COUNTY OF LOS ANGELES,  
20 BLAKE RUNGE, and DOES 1-10,

21 Defendants.

Case No. 2:23-cv-09285-KS

**DEFENDANT BLAKE RUNGE'S  
RESPONSES TO PLAINTIFF'S  
REQUEST FOR ADMISSION (SET  
ONE)**

[Assigned to Magistrate Judge Karen L.  
Stevenson, Courtroom 580]

22  
23 PROPOUNDING PARTY: URSULA BYRAM, ET AL.

24 RESPONDING PARTY: DEFENDANT BLAKE RUNGE

25 SET NO.: ONE

26 COMES NOW DEFENDANT BLAKE RUNGE, and responds to Plaintiff's

27 Requests for Admission (Set One), as follows:

28 ///

1 not in evidence.

2 Without waiving said objections, and subject thereto, this Responding Party  
3 responds as follows: Responding Party cannot admit or deny this Request as phrased.  
4 However, Responding Party admits only that a statement was made during  
5 investigation.

6 Discovery and investigation are ongoing. Responding Party reserves the right  
7 to amend or supplement this response.

8 **REQUEST FOR ADMISSION NO. 3:**

9 Admit that YOU did not face any disciplinary action from COUNTY following  
10 the INCIDENT.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 3:**

12 Objection. The phrases "face", "any", "disciplined by any person or agency"  
13 and "conduct" are vague, ambiguous, and overbroad. Further, this Request is vague,  
14 ambiguous, and overbroad as to time and scope. This request may be violative of  
15 attorney-client privilege and/or attorney work-product doctrine. This request also  
16 lacks foundation and is argumentative because it assumes that there was disciplinary  
17 action, which is not in evidence.

18 Without waiving said objections, and subject thereto, this Responding Party  
19 responds as follows: Responding Party cannot admit or deny the Request as phrased  
20 given the faulty phrasing of this Request in its entirety.

21 Discovery and investigation are ongoing. Responding Party reserves the right  
22 to amend or supplement this response.

23 **REQUEST FOR ADMISSION NO. 4:**

24 Admit that YOU were a member of the Inclusive Province AKIA (IPA) gang.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

26 Objection. The phrases "were a member" and "Inclusive Province AKIA (IPA)  
27 gang" are vague, ambiguous, and overbroad. This request is compound as to what it  
28 seeks. This request may be violative of attorney-client privilege and/or attorney work-



1 product doctrine. This request seeks information which is neither relevant nor  
2 reasonably calculated to lead to the discovery of admissible evidence. Responding  
3 Party is unable to respond to this request pursuant to *Federal Rules of Civil Procedure*,  
4 Rule 36, without speculating as to what Propounding Party is asking. This request is  
5 overbroad as to time and scope. Further, this request also lacks foundation and is  
6 argumentative because it assumes that there is a gang called Inclusive Province AKIA  
7 (IPA), which is not in evidence.

8 **REQUEST FOR ADMISSION NO. 5:**

9 Admit that YOU are a member of the Inclusive Province AKIA (IPA) gang.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

11 Objection. The phrases "are", "member" and "Inclusive Province AKIA (IPA)  
12 gang" are vague, ambiguous, and overbroad. This request may be violative of  
13 attorney-client privilege and/or attorney work-product doctrine. This request seeks  
14 information which is neither relevant nor reasonably calculated to lead to the  
15 discovery of admissible evidence. Responding Party is unable to respond to this  
16 request pursuant to *Federal Rules of Civil Procedure*, Rule 36, without speculating as  
17 to what Propounding Party is asking. This request is overbroad as to time and scope.  
18 This request is compound as to what it seeks. Further, this request also lacks  
19 foundation and is argumentative because it assumes that there is a gang called  
20 Inclusive Province AKIA (IPA), which is not in evidence.

21 **REQUEST FOR ADMISSION NO. 6:**

22 Admit that YOU were a member of a gang that was led by Deputy Konrad  
23 Thieme within the Los Angeles Sheriff's Department.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 6:**

25 Objection. The phrases "were a member" and "gang that was led by Deputy  
26 Konrad Thieme" are vague, ambiguous, and overbroad. This request may be violative  
27 of attorney-client privilege and/or attorney work-product doctrine. This request seeks  
28 information which is neither relevant nor reasonably calculated to lead to the

**PROOF OF SERVICE**

**Ursula Byram, et al. v. County of Los Angeles, et al.  
Case No. 2:23-cv-09285-SB (MARx)**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 725 S. Figueroa Street, Suite 3800, Los Angeles, CA 90017.

On March 20, 2024, I served true copies of the following document(s) described as

- **DEFENDANT BLAKE RUNGE'S RESPONSES TO PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS, SET ONE;**
- **DEFENDANT BLAKE RUNGE'S RESPONSES TO PLAINTIFF'S REQUEST FOR ADMISSION, SET ONE;**
- **DEFENDANT COUNTY OF LOS ANGELES' RESPONSES TO PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS, SET ONE; AND**
- **DECLARATION OF SERGEANT DONALD MOORE IN SUPPORT OF COUNTY OF LOS ANGELES' OFFICIAL INFORMATION PRIVILEGE IN RESPONSE TO PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS, SET ONE**

on the interested parties in this action as follows:

**SEE ATTACHED SERVICE LIST**

**BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address [aramirez@hurrellcantrall.com](mailto:aramirez@hurrellcantrall.com) to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on March 20, 2024, at Los Angeles, California.

/s/ Ana Ramirez  
Ana Ramirez

SERVICE LIST

**Ursula Byram, et al. v. County of Los Angeles, et al.**  
**Case No. 2:23-cv-09285-SB (MARx)**

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**EXHIBIT “D”**

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7 Attorneys for Defendants, COUNTY OF LOS ANGELES and BLAKE RUNGE

8  
9  
10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

12  
13 URSULA BYRAM, S.B. by and  
through guardian ad litem TIMOTHY  
14 BYRAM, N.B. by and through guardian  
ad litem TIMOTHY BYRAM, and A.B.  
15 by and through guardian ad litem  
KAITLYN HUMENCHUK,  
16 individually and as successors-in-  
interest to Everett Byram,

17 Plaintiffs,

18 v.

19 COUNTY OF LOS ANGELES,  
20 BLAKE RUNGE, and DOES 1-10,

21 Defendants.

Case No. 2:23-cv-09285-KS

**DEFENDANT BLAKE RUNGE'S  
RESPONSES TO PLAINTIFF'S  
REQUEST FOR PRODUCTION OF  
DOCUMENTS (SET ONE)**

[Assigned to Magistrate Judge Karen L.  
Stevenson, Courtroom 580]

22  
23 PROPOUNDING PARTY: URSULA BYRAM, ET AL.

24 RESPONDING PARTY: DEFENDANT BLAKE RUNGE

25 SET NO.: ONE

26 COMES NOW DEFENDANT BLAKE RUNGE, and responds to Plaintiff's  
27 Requests for Production of Documents (Set One), as follows:

28 ///

**RESPONSES TO REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 1:**

All DOCUMENTS that REFER or RELATE TO you present or past membership, participation, affiliation, or association with the Inclusive Province AKIA (IPA) gang that was led by Deputy Konrad Thieme within the Los Angeles Sheriff's Department.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 1:**

Objection. The phrases "REFER or RELATE TO", "past or present membership, participation, affiliation, or association", and "led by" are vague, ambiguous, and overbroad as to time and scope. This request is compound. The request is also burdensome, oppressive, vexatious, and harassing. The discovery Plaintiff seeks is unreasonably cumulative and duplicative. *Federal Rules of Civil Procedure*, Rule 26(b)(2)(C)(1). Further, this request also lacks foundation and is argumentative because it assumes that there is a gang called Inclusive Province AKIA (IPA), which is not in evidence.

As phrased, the request is unintelligible, and the propounding party has failed to describe the items sought by category with reasonable particularity. *Fed. R. Civ. P.* 26(b), 24(b) and *SEC v. American Beryllium & Oil Corp.*, 47 F.R.D. 66, 68 (S.D.N.Y. 1968). The request further seeks information not reasonably likely to lead to the discovery of relevant admissible evidence.

This request calls for information protected by fundamental privacy principals, privileges and laws including, but not limited to the First Amendment of the United States Constitution, Article 1 of the California Constitution. See *Katz v. United States*, 389 U.S. 437, 350 (1967); *White v. Davis*, 13 Cal.3d 757, 773; *Arcelona v. Municipal Court*, 113 Cal.App.3d 523, 532 (1980); *Harding Lawson Assoc. v. Super. Ct.*, 10 Cal.App.4th 7, 10 (1992); and *Scharf v. Regents of Univ. of Cal.*, 234 Cal.App.3d 1393, 1408 (1991).

As phrased, this request seeks information which is presumptively privileged

1 under both state and federal law. The official information privilege applies to  
2 information acquired in confidence by a public employee in the course of his duty and  
3 not open, or officially disclosed, to the public prior to the time the claim of privilege  
4 is made. See *Sanchez v. City of Santa Ana*, 936 F.2d 1027, 1033 (9th Cir. 1990).  
5 Moreover, the potential benefit of disclosure of these documents do not outweigh the  
6 potential disadvantage of such disclosure.

7 **REQUEST FOR PRODUCTION NO. 2:**

8 All DOCUMENTS that REFER or RELATE TO the Inclusive Province AKIA  
9 (IPA) gang that was led by Deputy Konrad Thieme and operated (and may continue  
10 to operate) within the Los Angeles Sheriff's Department.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 2:**

12 Objection. The phrases "REFER or RELATE TO", "led by", "operated", and  
13 "within the Los Angeles Sheriff's Department" are vague, ambiguous, and overbroad  
14 as to time and scope. This request is compound. The request is also burdensome,  
15 oppressive, vexatious, and harassing. The discovery Plaintiff seeks is unreasonably  
16 cumulative and duplicative. *Federal Rules of Civil Procedure*, Rule 26(b)(2)(C)(1).  
17 Further, this request also lacks foundation and is argumentative because it assumes  
18 that there is a gang called Inclusive Province AKIA (IPA), which is not in evidence.

19 As phrased, the request is unintelligible, and the propounding party has failed  
20 to describe the items sought by category with reasonable particularity. *Fed. R. Civ. P.*  
21 26(b), 24(b) and *SEC v. American Beryllium & Oil Corp.*, 47 F.R.D. 66, 68 (S.D.N.Y.  
22 1968). The request further seeks information not reasonably likely to lead to the  
23 discovery of relevant admissible evidence.

24 This request calls for information protected by fundamental privacy principals,  
25 privileges and laws including, but not limited to the First Amendment of the United  
26 States Constitution, Article 1 of the California Constitution. See *Katz v. United States*,  
27 389 U.S. 437, 350 (1967); *White v. Davis*, 13 Cal.3d 757, 773; *Arcelona v. Municipal*  
28 *Court*, 113 Cal.App.3d 523, 532 (1980); *Harding Lawson Assoc. v. Super. Ct.*, 10

1 Cal.App.4th 7, 10 (1992); and *Scharf v. Regents of Univ. of Cal.*, 234 Cal.App.3d  
2 1393, 1408 (1991).

3 As phrased, this request seeks information which is presumptively privileged  
4 under both state and federal law. The official information privilege applies to  
5 information acquired in confidence by a public employee in the course of his duty and  
6 not open, or officially disclosed, to the public prior to the time the claim of privilege  
7 is made. See *Sanchez v. City of Santa Ana*, 936 F.2d 1027, 1033 (9th Cir. 1990).  
8 Moreover, the potential benefit of disclosure of these documents do not outweigh the  
9 potential disadvantage of such disclosure.

10 **REQUEST FOR PRODUCTION NO. 3:**

11 Any DOCUMENTS that REFER or RELATE TO tattoos that YOU have. This  
12 includes photos of any tattoos you have on YOUR body.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

14 Objection. The phrases "REFER or RELATE TO", "includes", "any tattoos",  
15 and "body" are vague, ambiguous, and overbroad as to time and scope. Further, it is  
16 compound and assumes facts not in evidence. The request is also burdensome,  
17 oppressive, vexatious, and harassing. It is Compound. The discovery Plaintiff seeks  
18 is unreasonably cumulative and duplicative. *Federal Rules of Civil Procedure*, Rule  
19 26(b)(2)(C)(1). Further, this request is argumentative.

20 As phrased, the request is unintelligible, and the propounding party has failed  
21 to describe the items sought by category with reasonable particularity. *Fed. R. Civ. P.*  
22 26(b), 24(b) and *SEC v. American Beryllium & Oil Corp.*, 47 F.R.D. 66, 68 (S.D.N.Y.  
23 1968). The request further seeks information not reasonably likely to lead to the  
24 discovery of relevant admissible evidence.

25 This request calls for information protected by fundamental privacy principals,  
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3 1393, 1408 (1991).

4 As phrased, this request seeks information which is presumptively privileged  
5 under both state and federal law. The official information privilege applies to  
6 information acquired in confidence by a public employee in the course of his duty and  
7 not open, or officially disclosed, to the public prior to the time the claim of privilege  
8 is made. See *Sanchez v. City of Santa Ana*, 936 F.2d 1027, 1033 (9th Cir. 1990).  
9 Moreover, the potential benefit of disclosure of these documents do not outweigh the  
10 potential disadvantage of such disclosure.

11 Subject to and without waiving said objections, Responding Party answers as  
12 follows: Responding Party is amenable to meet and confer with propounding party to  
13 narrow the scope of this discovery request.

14 **REQUEST FOR PRODUCTION NO. 4:**

15 Any DOCUMENTS that REFER or RELATE TO the INCIDENT, including  
16 but not limited to text messages and communications within any applications, that  
17 refer to, concern, or are in any way related to the incident in question. This request  
18 encompasses all forms of written, electronic, or digital communications.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 4:**

20 Objection. The phrases "REFER or RELATE TO", "INCIDENT", "including  
21 but not limited to", "text messages and communications", "within any application",  
22 "refer to, concern, or are in any way related", and "all forms of written, electrical, or  
23 digital communications" are vague, ambiguous, and overbroad as to time and scope.  
24 Further, it is compound and assumes facts not in evidence. The request is also  
25 burdensome, oppressive, vexatious, and harassing. It is Compound. The discovery  
26 Plaintiff seeks is unreasonably cumulative and duplicative. *Federal Rules of Civil*  
27 *Procedure*, Rule 26(b)(2)(C)(1).

28 As phrased, the request is unintelligible, and the propounding party has failed

**PROOF OF SERVICE**

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**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on March 20, 2024, at Los Angeles, California.

/s/ Ana Ramirez  
Ana Ramirez

SERVICE LIST

**Ursula Byram, et al. v. County of Los Angeles, et al.**  
**Case No. 2:23-cv-09285-SB (MARx)**

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